

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ORIGINAL

CHRISTINA H. BURROW
DIRECT DIAL 202-776-2687
cburrow@dialaw.comWASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

July 15, 2002

RECEIVED

JUL 15 2002

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYRe: 2002-Second Quarter Status Report - E911 TTY Implementation,
Triton PCS, Inc. and Triton PCS License Company, L.L.C.,
CC Docket No. 94-102

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission's Fourth Report and Order in CC Docket 94-102 ("Fourth R&O"), this letter provides a status report on the efforts by Triton PCS, Inc. and its licensee subsidiary Triton PCS License Company, L.L.C. (collectively "Triton") to implement E911 text telephone ("TTY") compatibility on Triton's commercial wireless services networks. In the Fourth R&O, the Commission requested that carriers provide reports by the fifteenth of the month following the end of each calendar quarter detailing certain development, testing, and deployment activities. This letter is Triton's sixth E911 TTY report and it covers activity during the second quarter of 2002. As described below, Triton has fulfilled the Commission's requirements regarding implementation of TTY compatibility within its TDMA network.

Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. Across all these markets, Triton's network utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton has been dependent on Ericsson's development of TTY solutions that could be integrated into Triton's existing network.

During the second quarter of 2002, Triton was able to implement TTY compatibility within its TDMA network. Ericsson made its TTY feature generally available in late April and Triton deployed it in each of its Mobile Switching Centers ("MSC") in May 2002. An internal test plan was developed and implemented at each MSC location to ensure that the feature was functioning properly. Throughout the month of June 2002, testing with the individual PSAPs within Triton's markets proceeded with great success. Accordingly, Triton's TDMA network now complies with the Commission's requirements found in 47 C.F.R. § 20.18(c).¹

¹Triton is overlaying portions of its TDMA network with GSM infrastructure. The GSM network is anticipated to be available for commercial service in the mid to late fourth quarter of 2002. Triton expects that network to be TTY compatible.

No. of Copies rec'd 0+4
List ABCDE

In establishing its quarterly reporting requirement, the Commission requested that reporting carriers provide specific information on the following “milestones” and issues:

Development Activities

1. **Network Infrastructure Software Development.**
As outlined above, Ericsson is Triton’s infrastructure vendor across Triton’s entire TDMA network. Ericsson’s TDMA TTY compatibility feature has been installed and internally tested within each of Triton’s seven MSC locations.
 2. **Handset Development and Testing Plans.**
Handset development and testing is the responsibility of Triton’s handset vendors / manufacturers. Triton does not manufacture any handsets itself and must rely on the handset vendor’s TTY development efforts. At this time, Triton has available to it one TTY compatible handset model from one of its handset vendors. The handset is a model manufactured by Panasonic, which is available at all of Triton’s retail locations. Triton also intends to sell another TTY handset model from Ericsson once it becomes generally available.
 3. **Beta Testing and Lab Testing.**
This testing will be completed by the handset vendors rather than carriers such as Triton.
 4. **Release and General Availability to Carriers of Network Infrastructure Software.**
As discussed above, Ericsson made its TDMA TTY compatibility software generally available in April 2002. Triton installed and internally tested this software in each of its MSCs during May 2002.
 5. **Availability to Carriers of Full Acceptance Test Units.**
Triton currently has available to it one TTY compatible handset model from Panasonic, one of its three main handset vendors. Triton’s other handset vendors still are developing their TTY compatible models for release. It is anticipated that an additional model with TTY capability will be made generally available this summer, which Triton intends to offer as well.
 6. **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices.**
These efforts are directly dependent on the efforts of Triton’s infrastructure vendor, Ericsson, and upon Triton’s handset vendors. After the necessary Ericsson TTY feature is installed, Triton will take all steps within its control to achieve compatibility between enhanced TTY devices and the Ericsson TDMA platform that makes up Triton’s current network.
-

Testing and Deployment Activities

7. Carrier coordination of testing with PSAP.

Triton used its existing relationships with PSAPs to facilitate testing of TTY compatibility with E911 communications.

8. Carrier Testing Activities, Including Field Testing, Consumer End-to-End Testing, and Other Necessary Tests.

Individual PSAP testing occurred in June 2002 with great success.

- There are 186 individual PSAPs within Triton's TDMA network coverage area. Each PSAP was contacted regarding its TTY status and whether it would test Triton's TTY solution. Of the 186 PSAPs contacted, 148 indicated that they were TTY ready and willing to test TTY with Triton.
- The remaining PSAPs indicated various reasons for not being TTY ready or for not wanting to test. These reasons included PSAPs where the TTY equipment was not functioning; the cell center was being relocated; or new TTY equipment was on order. Some PSAPs did not respond to the request for testing.
- Triton has successfully tested with 145 of the 148 PSAPs that indicated they were TTY ready and willing to test. This is a 98.0% success rate on the PSAPs that had indicated they were TTY ready and willing to test. Based on the tests and Triton's discussions with the three PSAPs that did not have successful tests, it appears that the failures did not result from faults in Triton's TTY implementation. Triton is diligently working with the PSAPs towards resolving the issues that are causing the TTY calls to fail and to complete testing.
- Triton also intends to follow up with the 38 additional PSAPs that indicated they are not TTY ready due to being E911 Phase 0 (*i.e.*, calls are routed into an administration number) or did not respond to testing requests.

9. Retail Availability of Necessary Consumer Equipment.

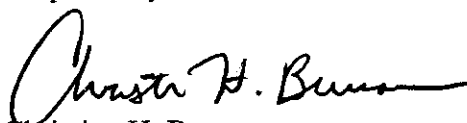
As TTY compatible consumer equipment becomes available, and after Triton thoroughly tests the consumer equipment, Triton will make TTY compatible equipment available through its established chain of retail outlets, its Internet website and all other marketing sources. At this time, Triton has available one TTY compatible handset from its handset vendors, which Triton is stocking in all of its retail locations. The handset is manufactured by Panasonic. Triton also intends to stock another TTY handset model from Ericsson once it becomes generally available.

10. Geographic Scope of Network Infrastructure Deployment.

Triton has deployed TTY support capability and compatibility in its entire TDMA network.

Should any questions arise or if there is need for further information concerning this Triton status report or Triton's TTY implementation, please contact the undersigned at (202)-776-2687.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christina H. Burrow". The signature is fluid and cursive, with a large initial 'C'.

Christina H. Burrow
Counsel for Triton PCS, Inc. and Triton PCS
License Company, L.L.C.

cc: Glen Robinson – Senior Vice President, Engineering and IT
Patrick Forster, Wireless Telecommunications Bureau
Mindy Littell, Wireless Telecommunications Bureau